

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
USA ROOFING PARTNERS, LLC	§	Case No. 21-33691
	§	Chapter 11
Debtor	§	

CHAPTER 11 SUBCHAPTER V STATUS REPORT

1. The efforts Debtor has undertaken and will undertake to attain a consensual reorganization plan.

The Debtor intends to take actions to obtain a consensual plan. The Debtor has made significant efforts to provide financial and other information to Ruth Lake Investments from the beginning of the case. The Debtor will continue to attempt to provide information to Ruth Lake as requested.

2. Any complications the debtor anticipates in promptly proposing and confirming a plan, including any need for discovery, valuation, motion practice, claim adjudication, or adversary proceeding litigation.

At this time, the Debtor anticipates that Ruth Lake may object to any and all actions of the Debtor. The Debtor will attempt to address the concerns of Ruth Lake and also any other creditors.

3. An outline of the proposed plan.

The Debtor anticipates a plan to repay Ruth Lake in full and other creditors in full.

4. A description of the nature of the debtor's business or occupation, the primary place of business, the number of locations from which it operates, and the number of employees or independent contractors it utilizes in its normal business operations and the goals of the reorganization plan.

The Debtor is in the commercial roofing business. The Debtor is principally operating in the greater Houston area but also has job sites in other states. The business has a yard for storage of excess supplies but the principals of the business operate from their homes. The Debtor principally uses subcontractors for providing services. The Debtor is hopeful to expand its business during the case.

5. Any motions the debtor contemplates filing or expects to file before confirmation.

The Debtor contemplates that it may need to file an action against Triad for failure to make payments to the Debtor. The failure of Triad to pay the amounts owed to the Debtor was the basis for the bankruptcy filing of the Debtor. Triad's promises to pay and then failure to pay led to significant issues with other creditors.

6. Any objections to any claims or interests the debtor expects to file before confirmation and any potential need to estimate claims for voting purposes.

The Debtor needs to review the details and documents for the claim of Ruth Lake Investments. The Debtor may need documents and details of other claims.

7. The business, financial, and other problems that prompted the filing of this case.

The Debtor provided materials for Triad on the promise of Triad to pay in approximately 30 days. Triad did not pay and the failure to pay caused other significant problems for the Debtor in its operations.

8. Attendance at a meeting of creditors pursuant to 11 U.S.C. § 341(a).

The Debtor appeared at its creditors meeting on January 17, 2023, and the meeting was concluded.

9. Estate's need for professionals (e.g., attorneys, accountants, brokers, etc.).

The Debtor has filed applications to employ its counsel and accountant. The Debtor may file an application to employ a business consultant in the near future.

10. Whether the debtor is current on the filing of all required tax returns.

The Debtor is current on the filing of all required tax returns.

11. Unique issues concerning secured debt, employees, cash collateral, executory contracts, and existing management.

The Debtor had financed or factored receivables with Ruth Lake but such financing stopped during the summer of 2022. The Debtor has had continuing issues with the Ruth Lake financing and actions by Ruth Lake.

12. Postpetition operations and revenue.

The Debtor has continued in its operations after filing. The Debtor has recently obtained approval for use of cash collateral.

13. Status of any litigation pending in or outside this Court.

The Debtor was and still is a party to a lawsuit in state court. The state court action has been stayed due to the bankruptcy.

14. Compliance with requests for information from the United States Trustee including, but not limited to, requests made in the Initial Debtor Interview.

The Debtor either has complied or will shortly comply with the requests of the U.S. Trustee.

15. Type and adequacy of insurance coverage.

The Debtor has sufficient insurance coverage for its business.

16. Debtor-In-Possession Bank Account.

The Debtor and the U.S. Trustee entered into a Stipulation on a DIP account at docket #51 on January 17, 2023.

17. Any other matters that might materially affect the administration of this case.

None known.

Respectfully submitted,

/s/ Reese Baker
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